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8  
9 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

10  
11 FEDERAL TRADE COMMISSION,

12 Plaintiff,

13 v.

14 OMICS GROUP INC., et al.,

15 Defendants.

Case No. 2:16-cv-02022-GMN-VCF

STIPULATION AND ORDER TO  
EXTEND RESPONSE DEADLINE

(FIRST REQUEST)

16  
17 Defendants, OMICS GROUP INC., IMEDPUB LLC, CONFERENCE SERIES LLC,  
18 and SRINUBABU GEDELA, by and through counsel of record, D. Neal Tomlinson and  
19 Kristina R. Kleist, and Plaintiff, FEDERAL TRADE COMMISSION, by and through counsel of  
20 record, Gregory A. Ashe and Michael E. Tankersley, hereby agree and stipulate as follows:

- 21 1. On March 23, 2018, Plaintiff filed its Motion to for Sanctions Regarding Solicitation  
22 Evidence (Dkt. No. 72).  
23 2. On April 2, 2018, a hearing took place on Plaintiff's Motion to Compel (Dkt. No. 63)  
24 and Motion to Compel to Determine the Sufficiency of Answers to Requests for  
25 Admissions (Dkt. No. 66).  
26 3. On April 4, 2018, a Minute Order was issued granting Plaintiff's Motions and  
27 requiring Defendants to provide complete responses.  
28

- 1 4. Additionally, pursuant to the Minute Order, the parties are required to file a joint  
2 status report concerning any outstanding discovery by April 23, 2018 and thereafter a  
3 hearing will be set on Plaintiff's Motion for Sanctions.
- 4 5. Following the hearing, a conference was held between Plaintiff's counsel,  
5 Defendants' counsel, and Mr. Kishore Vattikoti, Defendants' Indian counsel, to  
6 identify and discuss all discovery issues.
- 7 6. Defendants and their counsel have been working since the hearing and conference  
8 held on April 2, 2018 to thoroughly review and address each discovery response as  
9 identified in the Motions and by Plaintiff's counsel to respond while Mr. Vattikoti is  
10 in the United States.
- 11 7. As a professional courtesy and in accommodation of Defendants' and their counsel  
12 addressing the Order on Plaintiff's Motions, and other discovery issues identified by  
13 Plaintiff, Plaintiff's counsel has agreed to an extension of the April 6, 2018 response  
14 deadline for the Motion to for Sanctions Regarding Solicitation Evidence (Dkt. No.  
15 72).
- 16 8. The parties have agreed that Defendants will file their response no later than April  
17 16, 2018.
- 18 9. This Stipulation is being made in good faith between and at the request of both  
19 Parties, and not for purposes of delay.

20 HYPERION ADVISORS

21 Dated this 6<sup>th</sup> day of April, 2017.

22 /s/ D. Neal Tomlinson

23 D. NEAL TOMLINSON

24 Nevada Bar No. 06851

25 KRISTINA R. KLEIST

26 Nevada Bar No. 13520

3960 Howard Hughes Parkway, Suite 500

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27 *Attorneys for Defendants*

FEDERAL TRADE COMMISSION

Dated this 6<sup>th</sup> day of April, 2017.

/s/ Michael E. Tankersley

DAVID C. SHONKA

Acting General Counsel

GREGORY A. ASHE

MICHAEL E. TANKERSLEY

Federal Trade Commission

600 Pennsylvania Avenue NW

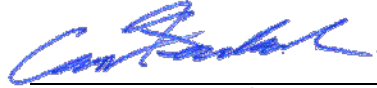
Washington, DC 20850

28 *Attorneys for Plaintiff*

**ORDER**

**IT IS SO ORDERED.**

Dated this 9th day of April, 2018.



Cam Ferenbach  
United States Magistrate Judge

Respectfully submitted by:

HYPERION ADVISORS

/s/ D. Neal Tomlinson

D. NEAL TOMLINSON  
Nevada Bar No. 06851  
KRISTINA KLEIST  
Nevada Bar No. 13520  
*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on April 6, 2018, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND RESPONSE DEADLINE (FIRST REQUEST)** was filed electronically with the United States District Court for the District of Nevada using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system.

/s/ D. Neal Tomlinson  
Attorney for Defendants